

Taing, Adam@Waterboards

From: Jeff Cooper <jeffcbinc@aol.com>
Sent: Monday, April 11, 2016 3:09 PM
To: Taing, Adam@Waterboards
Subject: Re: Wastewater disposal information for Investigative Order R4-2015-0350

Los Angeles Regional Water Quality Control Board
320 W. Fourth Street, Suite 200
Los Angeles, CA 90013
Attn: Adam Taing
Taing.Adam@waterboards.ca.gov

April 11, 2016

Re: "Investigative Order R4-2015-0350"

Dear Mr. Taing,

This correspondence is intended to clarify the issues you raised in your email dated April 5, 2015.

You mentioned a status issue with Watson #1 (037-05053). It is a pumper and should have been classified accordingly in my initial response letter.

Your DOGGR volumes for the total produced water, barrels put away at Brown & Bevis and Title Insurance Trust operations, and discharge volumes to the County Sanitation Districts of Los Angeles County (CSDLAC) appear to be correct. The information regarding the sewer connections is as follows:

Bank/Republic Trust Lease: CSDLAC Permit #013042
Campbell Lease: CSDLAC Permit #019291
Howard Park Lease: CSDLAC Permit #012877
Watson A/B Lease: CSDLAC Permit #01266

None of these facilities employ evaporative ponds for the disposal of produced water.

I apologize for any confusion caused by my previous submittal.

Very truly yours,

Jeff Cooper

Cooper & Brain, Inc.
P. O. Box 1177
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-----Original Message-----

From: Taing, Adam@Waterboards <Adam.Taing@Waterboards.ca.gov>
To: jeffcbinc <jeffcbinc@aol.com>

Sent: Tue, Apr 5, 2016 12:56 pm
Subject: Wastewater disposal information for Investigative Order R4-2015-0350

Mr. Jeff Cooper,

Thank you for your response regarding Investigative Order R4-2015-0350. After receiving your response and verifying the information on DOGGR's website, I've found the following:

- Well 037-05053 (Watson A #1) were omitted from your response as active wells. This well was identified as "active" under DOGGR's database.
- Cooper and Brain operates two (2) waste disposal/injection wells as stated in the response; Brown Bevis Lease Well #30 (037-17304) and Title Insurance and Trust Co #2 (037-07204). According to DOGGR records, annual injection volumes were 9,386 bbls and 36,300 bbls, respectively.
- Cumulative totals of the Brown Bevis Lease and Title Insurance and Trust Co appears to indicate that all wastewaters are reinjected into the respective waste disposal wells.
- For 2015, Cooper and Brain produced **187,675 bbls** of waste water, of which **46,136 bbls** were reinjected, equaling a total of **141,539 bbls** disposed through the sanitation district.

As a follow up to your response, please provide the following for further clarification:

- Permit numbers and the respective sanitation district the wastewater is disposed into for each lease operated.
- Verify volumes disposed into the sanitation districts. Volumes are provided in the excel spreadsheet attached to this email. The volumes were obtained from DOGGR's database.
- Provide method for obtaining volumes if different from the numbers obtained from DOGGR (e.g. metered flow rates)
- Any other waste disposition methods that were not previously mentioned (e.g. waste manifest tickets from vac truck disposal, 3rd party operators)

Please kindly provide a response by April 10th, 2016. If you have any questions, please feel free to contact me.

Thank you,

Adam Taing

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